

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 04-CV-11136GAO
	)	
DIRECT MARKETING CONCEPTS, INC., et	)	
al.,	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' MOTION FOR LEAVE TO FILE  
A MEMORANDUM OF LAW IN EXCESS OF 20 PAGES**

Defendants Direct Marketing Concepts, Inc., ITV Direct, Inc. and Donald W. Barrett (“DMC Defendants”) hereby move for leave of this Court to file an Opposition to Plaintiff’s Motion for Summary Judgment which is in excess of the twenty-page limit provided in Local Rule 7.1(b)(4). The Memorandum of Law contains 50 pages.

As grounds for this Motion, DMC Defendants state that the Plaintiff filed a memorandum of law containing 50 pages. In order for the DMC Defendants have to respond the Plaintiff’s motion for summary judgment, a detailed presentation of the disputed facts and analysis of the legal issues pertaining to all defendants will assist the Court in ruling on the Plaintiff’s Motion.

WHEREFORE, DMC Defendants respectfully request that this Court allow it to file an Opposition to Plaintiff’s Motion for Summary Judgment in excess of twenty pages.

Respectfully submitted,  
DIRECT MARKETING CONCEPTS, INC.,  
ITV DIRECT, INC., AND DONALD W.  
BARRETT

By their attorney(s),

/s/ Christopher F. Robertson

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